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# MEMO ENDORSED

July 3, 2025

**VIA EMAIL & ECF**  
**(gstein@nysdchambers@nysd.uscourts.gov)**

The Honorable Gary Stein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Room 702  
United States Courthouse  
New York, New York 10007

**Re: Vista US Assets LLC, et al. v. Nations Consulting Group, LLC**  
**Case #: 1:25-cv-02094-RMB-GS**

***Request To Suspend the July 10 Settlement Conference***

Dear Judge Stein,

We represent Defendant Nations Consulting Group, LLC in the above-captioned matter and we write to request that the settlement conference scheduled for July 10, 2025 be adjourned without date, and that the action be stayed until August 5, 2025.

This afternoon, as we were finalizing Defendant's settlement conference submissions and preparing for next week's settlement conference, we were advised by our client that it determined, given its financial condition, it will not be able to participate in the settlement conference and will not be able to continue prosecuting its counterclaims or defending Plaintiffs' claims. As illustrated in Defendant's Answer, Defendant has experienced irreparable financial harm and disruption to its business operations and, as a result, Defendant has shifted its attention towards preparing a bankruptcy petition under Chapter 7 of the United States Bankruptcy Code. Defendant anticipates that such a filing will be completed prior to August 2, 2025.

Given this development, and the anticipated automatic stay resulting from such a bankruptcy filing, we respectfully submit that good cause exists to suspend the settlement conference and any other proceedings through Monday, August 4, 2025. A suspension of deadlines will avoid burdening the resources of the Court and Plaintiffs' counsel. Such a stay should cause no prejudice to Plaintiffs because even if Plaintiffs were to prevail on all its claims any resulting judgment would be subjected to the avoidance protections associated with a bankruptcy filing. That said, as noted, Defendant has asserted substantial counterclaims, which can be addressed, along with Plaintiffs' claims, in the context of the anticipated bankruptcy case.

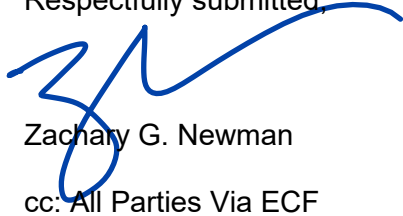
If Defendant does not file for bankruptcy by August 5, 2025, we do intend to move to be relieved as Defendant's counsel.

Honorable Gary Stein  
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Finally, we apologize for the lateness of this disclosure, but we just learned of this development this afternoon, and we promptly prepared this letter to notify the Court. Also, in advance of transmitting the letter, we immediately notified Plaintiffs' counsel by email that a request to adjourn the settlement conference would be forthcoming and invited counsel to contact us by telephone for additional detail.

We respectfully request, and thank Your Honor in advance, for the Court's prompt and thoughtful consideration of this matter, and we thank Your Honor for the time and attention already dedicated to this matter.

Respectfully submitted,



Zachary G. Newman

cc: All Parties Via ECF

Based on the representations in this letter, and the absence of any opposition from Plaintiff, the settlement conference scheduled for July 10, 2025 is hereby adjourned sine die. With respect to Defendant's request for a stay, Plaintiff is directed to submit a letter by no later than Thursday, July 10, 2025, informing the Court of its position.

Date: July 7, 2025  
New York, NY

**SO ORDERED:**



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**HON. GARY STEIN**  
UNITED STATES MAGISTRATE JUDGE